

EXHIBIT G

A Critical Look at Dr. Eric Braverman and his PATH Medical Clinic

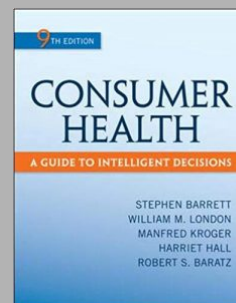
[Stephen Barrett, M.D.](#)

April 21, 2023

Eric R. Braverman, M.D. (1957-) is the founder and director of PATH Medical, a clinic that purports to focus on "brain health." (PATH is an acronym for "Place for Achieving Total Health.") He is also the founder and president of PATH Foundation NY, a non-profit organization described on its Web site as "devoted to establishing how the brain functions and using that information to develop practical diagnostic and treatment methods that improve wellbeing and increase longevity." [1] He also operated Total Health Nutrients, LLC, which marketed dietary supplements online and within his office at 304 Park Avenue South in New York City. He hosts a weekly radio program and has written or co-authored about a dozen books about brain/body health and nutrition and a few on religious topics. [A curriculum vitae posted on the PATH Medical Web site in 2014](#) described him as an "accomplished, world-renowned doctor, researcher, author, television and radio personality specializing in neurology, biochemistry, anti-aging, longevity, total health and wellness." This report describes why I am skeptical about what he does.

Background History

A recent Braverman CV states that he received a bachelor of arts degree in general science from Brandeis University in 1979, graduated from New York University Medical School in 1983, and had "postgraduate experience" at Massachusetts General Hospital (1978-1979) and Greenwich Hospital (1983-1984). [2] The listing for Greenwich does not indicate whether it was for one or two years, but other sources indicate that it was one. The American Board of Medical Specialties (ABMS), which is the standard-setting organization for medical specialties, does not list him as board-certified. It's not clear how he could have had postgraduate experience at Massachusetts General Hospital before he graduated from college. Braverman is "certified in anti-aging medicine" by the American Board of Anti-Aging Medicine,



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but this board is not recognized by the ABMS. All ABMS-recognized boards require at least three years of full-time postgraduate training in an approved program. The Anti-Aging board has no such requirement.

Braverman gave more detail about his early career in an article published in 1989 in the *Journal of Orthomolecular Medicine*, a publication that caters to practitioners who advocate using large doses of nutrients for treating schizophrenia and many other illnesses. At age 18, Braverman met and was impressed by Carl C. Pfeiffer, M.D., Ph.D. (1908-1988), who directed a megavitamin clinic called the Princeton Brain Bio Center. After completing his sophomore year at Brandeis, Braverman began helping Pfeiffer with research projects. He described his early association this way: "I slept on the floor at work, lived in his house, lived in his office, lived in the house next to the office. I lived and ate his vision of medical conquest."

After graduating from medical school, Braverman completed a 1-year internal medicine internship, then went to work at the Brain Bio Center, and later opened his own office in New Jersey. The article states that he was "in trouble" during his internship because of his unconventional ideas about nutrition [3].

In 1987, Braverman and Pfeiffer co-authored a book called *The Healing Nutrients Within*, which stated, "Pfeiffer's Law—We have found that if a drug can be found to do the job of medical healing, a nutrient can be found to do the same job. When we understand how a drug works, we can imitate its action with one of the nutrients." [4] This claim is preposterous.

From 1988 to 1996, Braverman was also a columnist for *Total Health* magazine, which promoted dietary supplements and many off-beat health approaches. During most of this period, the magazine's masthead identified him as "Rabbi Eric R. Braverman, M.D." and listed him as a "religion consultant." Neither his CV nor any other source I could find online indicate a basis for his use of this title. The standard pathway to becoming a rabbi is to attend a rabbinical college for several years. In 2017, Braverman's attorney sent me a photograph of a [certificate](#) that she said was proof that he was a rabbi. However, several experts who examined the document told me that it merely said he had completed certain studies under the supervision of a rabbi.

Braverman has been licensed to practice medicine in Alabama, Arizona, Florida, New Jersey, New York, Pennsylvania, and Utah. All but Alabama are still active. During the 1990s, Braverman owned and directed a clinic called Princeton Associates for Total Health. In 1998, after

Links to Recommended Vendors

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having been disciplined (as described below) by the New Jersey Medical Board, Braverman worked briefly with Dr. Robert Atkins and then opened PATH Medical in New York City [5].

In a [brochure for a 1999 seminar](#), Braverman described himself as “one of the foremost experts on the integration of conventional and alternative medicine.” The brochure stated that “the goal at PATH Medical is to regain health through a new, proven ‘brain first’ approach. Through the brain, one can diagnose and treat problems of the heart, blood, muscle, bone, lung, GI tract, nerves, and skin.”

At various times during the past several years, in addition to Braverman, PATH’s Web site has listed eight medical doctors, one osteopath, one chiropractor, two physician assistants, one acupuncturist, and a “Ph.D.” nutritionist. The nutritionist, John Pillepich, Ph.D., has a bachelor’s degree in health sciences from The College at Rockport, a master’s degree in nutritional sciences from the University of Washington, and a “Ph.D. in holistic nutrition” from Clayton College of Natural Medicine [6]. The first two schools are accredited, but Clayton was a nonaccredited correspondence school that shut down several years ago because it could not meet state licensing standards [7]. A former director of product development at the Brain Bio Center, Pillepich worked part-time for Braverman from 2004 through 2014, during part of which he was designated as “chief science advisor” for Total Health Nutrients. He also operates SupraHealth, which markets dietary supplements and provides “customized healing programs” to people who e-mail their concerns and questions related to 18 categories of health problems listed on the SupraHealth site [8].

Questionable Claims

The claims made by Braverman and his clinic were not modest. In a PATH Medical infomercial posted to YouTube:

Braverman said his Executive Health Program “goes far beyond what the most famous clinics offer.”

A patient said: “Don’t let anyone tell you you can’t be cured. Because at PATH Medical and Dr. Braverman, anything can be cured.”

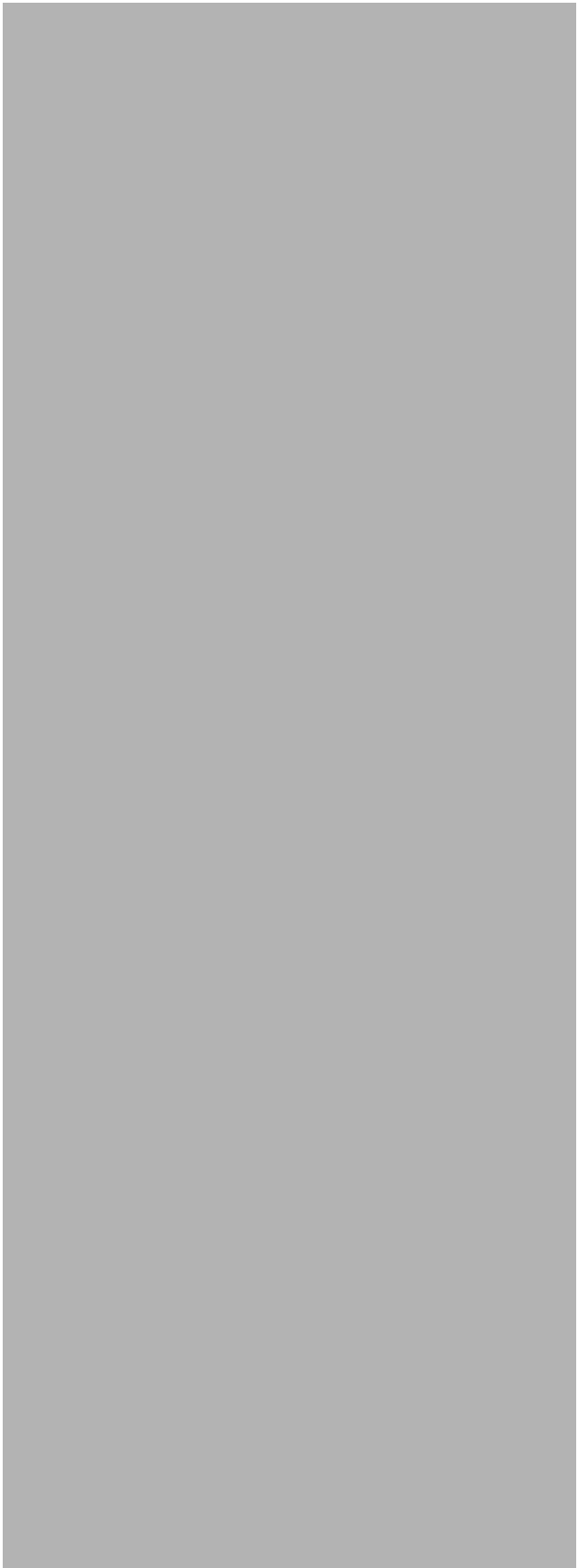
The narrator said: “They treat causes, not symptoms. They deliver cures, not prescription pad band-aids.”

The narrator also said: “He has worked miracles for his patients to help them live longer, live better, look better, and operate at peak performance.” [9]

In an article titled “Treat Your Brain Well . . . and It Will Treat You To A Longer and Better Life,” PATH Medical’s Web site stated:

Over four decades of research and clinical practice, Eric R. Braverman, M.D. has associated deficiencies in four primary neurotransmitters (brain chemicals)—Dopamine, Acetylcholine, GABA, Serotonin—to specific diseases and the general slowing down related to aging. The good news from Dr. Braverman is you can avoid, slow, reverse, or even cure medical conditions with natural approaches—diet, exercise, and nutritional supplements [10].

The article included a table that lists than 50 symptoms, diseases, and disease groups— abnormal smell, action tremors, addiction, allergies, Alzheimer's, arthritis, backache, blurred vision, carb craving, chest pain, chronic pain, cold/clammy hands, confusion, dizziness, dry cough, eye disorders, facial tremors, fat craving, fatigue, flushing, flushing or pallor, hallucinations, headaches, heart issues, hypertension, insomnia, joint pain, kidney issues, memory loss, multiple sclerosis, muscle tension, nausea, osteoporosis, palpitations, Parkinson's, PMS, poor concentration, poor libido, restlessness, salt craving, seizures, sexual dysfunction, shortness of breath, speech problems, stomach/G.I. issues, stroke, sweating, tachycardia, thyroid disorders, tinnitus, weight gain, and yawning—all of which Braverman claims are "deficiency symptoms" that are amenable to "natural treatment approaches." The "natural approaches," as shown in a portion of the table pictured below, include foods, dietary supplements and exercise. The article concludes: "For a comprehensive assessment of your neurotransmitters and anti-aging treatments that are based upon quantitative information—not guesswork—schedule a Brain Electrical Activity Map (BEAM) test today."



Neurotransmitter (Brain Chemical)	Deficiency Conditions	Natural Treatment Approaches
Acetylcholine	Arthritis Fat craving Memory loss Eye disorders Dry mouth Dry cough Speech problems Sexual dysfunction Osteoporosis Multiple Sclerosis Alzheimer's	Diet: choline-rich; almonds; artichokes; lean beef; broccoli; Brussels sprouts; cabbage; fish; pine nuts; tomato paste; wheat bran; toasted wheat germ Supplements: phosphatidyl choline powder; choline powder; huperzine A; phosphatidylserine, dopa bean; Ginkgo biloba; piracetam; Omega-3 fish oil; pregnenolone Exercise: aerobics (30 min per day)

PATH Medical's Web site also had a free "Brain Deficiency Quiz" claimed to relate common symptoms to neurotransmitter deficiencies, which it states can be corrected with supplements [11]. I do not believe this test is valid.

Proof that Braverman's treatment strategies are effective against this enormous number of diseases would require hundreds (possibly thousands) of well-designed clinical trials in which patients who receive a treatment regimen are compared to patients who do not. In February 2017, I [searched the U.S. National Library of Medicine PubMed database for "Braverman, E"](#) and found his name as author or co-author of about 90 publications in medical journals. However, except for one article about substance abuse, there were no outcome studies of his "natural treatment approaches." His 2017 CV includes about 100 more publications that appeared in lesser journals or were presented as abstracts at meetings. Only a few of these involved nutrient supplementation. Thus I see no published evidence that he has done even a tiny fraction of the studies that would be needed to substantiate his sweeping claims for BEAM testing and its associated treatment.

Questionable Testing



There is good reason to believe that patients who sought services at PATH Medical were encouraged to undergo expensive tests that the scientific community would consider unnecessary. On "Larry King Live," Braverman said that the clinic did "a brain health assessment on virtually everybody, because your brain health, your mind, your concentration, your memory, your brain's speed, your personality, your temperament, all impact your entire well being, and the course of every disease and the course of having a healthier life. . . . When you treat the brain, you're impacting every illness in your entire life. But what's different about us is that we do a head-to-toe computerized exam. Every doctor in America knows that a head-to-toe physical is the way you make observations about health. But today, the computer can actually make a better examination than a manual physician." [12]

PATH Medical described its Executive Health Program (EHP) as a "comprehensive head-to-toe examination in one day." Its components are said to include brain health assessments (including BEAM testing, which costs about \$2,000), head-to-toe ultrasounds, a neuromuscular-skeletal review, and tests of more than 250 "medical and aging markers." [13] A few of these, such as blood lipid levels, are standard screening tests, but the vast majority have not been proven cost-effective. Ultrasound testing is an example. There are many situations where ultrasound can help doctors evaluate the structure or function of parts of the body in patients who are having symptoms. But the odds of finding something significant are much too small to justify its use in patients who have no symptoms. The cost of the Executive Health Program depended on the number of tests ordered. Six "levels" are available: the "½ Silver Program," the "Silver Program" (\$10,000), the "Platinum Program," the "Rose Diamond Program" (\$50,000), the "Diamond Program" (\$75,000), and the "Elite Program" (\$100,000).

Braverman has used and promoted BEAM testing for more than 25 years. In his February 1990 *Total Health* magazine column, he described it as "the most exciting neurobiological research tool ever developed" and that it "symbolizes God's intervention in our world through science. . . . just one more dimension of technology that will be part of the age when Christ comes." [14] Shortly afterward, in the *Journal of Orthomolecular Medicine*, he stated:

Brain mapping can give clues in terms of treatment as well as to diagnosis of brain illnesses. Anyone with any type of serious behavioural disorder or deficit should have a brain map. In fact, brain mapping should probably be done on everyone as part of a total health check up. The brain is the most

important part of the body and affects all diseases. A healthy brain is the first priority on the PATH® to wellness. . . .

Brain imbalances are a factor in virtually all diseases [15].

In a 1991 issue of Total Health News (a one-page report published by the magazine), an article about Braverman and BEAM claimed that he had successfully treated “hundreds of seemingly incurable or untreatable cases.” [16] In a 2011 Huffington Post article, Braverman said:

The BEAM is considered the stress test of the brain, and it helps us identify disease by examining the brain's electrical chemistry. BEAM testing can help to detect Alzheimer's and memory loss even before symptoms present. It can also uncover, diagnose, and treat the imbalances associated with depression, insomnia, and schizophrenia [17].

BEAM testing—more commonly referred to as qEEG (quantitative EEG)—is a method of analyzing the electrical activity of the brain to measure and display patterns that may correspond to diagnostic information and/or cognitive deficits. It has a few medically accepted uses (most notably in some cases of epilepsy), but Braverman's use goes far beyond what has been proven or even suggested by mainstream researchers. In 1997, the American Academy of Neurology and the American Clinical Neurophysiology Society noted that “qEEG techniques are very predisposed to false-positive errors” and concluded that qEEG should be considered investigational for clinical use in post-concussion syndrome, mild-to-moderate head injury, learning disability, attention disorders, schizophrenia, depression, alcoholism, and drug abuse [18]. Aetna, which periodically reviews the status of qEEG, now says:

No current guidelines from leading medical professional organizations recommend the use of qEEG as a screening test for neurological and psychiatric conditions. Clinical studies have demonstrated distinctive forms of brain electrical activity in a few psychiatric conditions, but the clinical significance of these distinctive patterns of brain wave activity is unknown. No published peer-reviewed studies of the use of qEEG screening for these conditions show that management is altered such that clinical outcomes are improved. Much of the literature focuses on the use of qEEG in the early detection of dementia. Although several markers of early dementia have been reported, there is a lack of evidence that early detection of

dementia alters clinical management such that outcomes are improved, especially given the lack of robust treatments available.

An assessment by the Swedish Office of Health Technology Assessment found insufficient evidence to support the use of qEEG in dementia. Its assessment stated that there is limited evidence that that qEEG helps the diagnostic workup differentiate Alzheimer's disease patients from controls or from other dementia disorders [19].

Medical Board Action (1996-1997)

In July 1996, following a hearing, the New Jersey Board of Medical Examiners temporarily suspended Braverman's license and ordered him to stop seeing patients. The temporary suspension order included the following allegations:

His diagnosis and treatment of 11 patients was so inappropriate or unsafe, evidencing gross misdiagnosis and/or mismanagement of a wide variety of patient complaints, that the health or lives of his patients are endangered.

His charts were replete with examples of deviations from the standard of care that all practitioners owe their patients. His pattern of practice evidenced four therapeutic strategies that placed patient at risk.

He sometimes embarked on a "poly-pharmacy" plan of treatment—instituting a combination of pharmacologic agents—wholly unrelated to symptoms or complaints presented by the patients.

Sometimes, after extensive testing, he established multiple diagnoses and then proceeded to embark on a treatment regimen ignoring those very serious conditions.

Sometimes he reached diagnoses that lacked any clinical support in his own record of examination and testing.

Sometimes he initiated therapeutic approaches contraindicated by the patient's history or symptoms.

He repeatedly demonstrated a willingness to cast aside the patient's best interest to advance his own investigational theories without the safety net of approved research protocols and informed consent of the participants [20].

A petition from the Pennsylvania Medical Board, which reviewed what New Jersey was doing, indicates that a consultant who had evaluated the patient charts for the New Jersey Board had concluded that in 10 of the

11 cases, Braverman had administered or ordered diagnostic testing without indication—which “represented a significant deviation from the normal practice of medicine and allowed Braverman to charge exorbitant fees to his patients.” [21]

Braverman had broadcast a weekly radio program on station WOR, sponsored by his own vitamin company. WOR canceled the program when the charges became public [22].

In May 1997, the charges were settled with a consent order under which (a) Braverman was reprimanded for inadequate record keeping and incompletely examining a patient's wrist, (b) the remaining charges were withdrawn, (c) the suspension was lifted, and (d) Braverman agreed to pay \$20,000 for costs, complete two specified continuing medical education courses, and have patients' charts monitored by another physician for one year [23].

New York Attorney General Action (2013-2014)

In September 2013, the New York Attorney General asked the New York State Supreme Court to order PATH Medical to provide copies of various documents. The petition stated that more than 20 patients had complained to the Attorney General's Office (OAG) office about PATH's marketing and billing practices [24]. The judge ordered Braverman to cooperate with the investigation. I don't know whether he did, but in January 2015, the Attorney General issued a press release that summed up the problems and announced that Braverman had agreed to modify his practices [25]. The press release stated:

As part of its focus on early detection and treatment of disease, PATH Medical conducted extensive and expensive diagnostic tests during a patient's initial visit. Those tests include echocardiograms, costing \$1,900, “brain electrical activity mapping” tests, for \$2,000 collectively, multiple ultrasounds, ranging from \$450 to \$750, as well as psychological and cognitive assessments. PATH also sold packages of tests and services to patients that ranged in cost from \$10,000 to \$100,000. While the business, does not participate (i.e., is not “in-network”) in any health insurance plans, it led some consumers to believe that a significant percentage of the charges—sometimes up to 80%—would be covered by their health plans' out-of-network benefit. However, patients' health plans were not typically covering a significant percentage of the total charges for PATH Medical's services. Indeed, some plans were routinely denying the claims submitted by the practice. These alleged

inaccurate representations by PATH Medical resulted in some patients facing thousands of dollars in unexpected costs for a single visit. . . .

The complainants included one consumer who said she was told by PATH Medical's billing representative that the recommended testing for her first visit would cost approximately \$8,000. When she expressed concerns about the cost, she was advised that her insurance would cover 80 percent, and she would receive a 50 percent discount. Based on that, the consumer reported paying approximately \$4,000, and believed a portion of that would be reimbursed by her health insurance. Her health plan ultimately denied her submitted claims and PATH then advised her she was responsible for the full \$8,000.

The Attorney General's investigation into PATH Medical revealed that the practice did not routinely provide patients with any documentation reflecting what tests and services were purchased, the charges for those tests and services, and what discounts were applied. Some patients also expressed difficulty and frustration with obtaining the results of their extensive testing, and patients sometimes incurred unexpected charges for discussing the results of that testing.

The settlement requires PATH Medical to reform its practices to ensure patients are provided with accurate information about their financial responsibility before they agree to undergo any testing or other services. . . .

Under the agreement [26], PATH Medical was required to:

- Not represent that insurance may cover the cost of the testing conducted and services provided
- Revise its consent forms to clearly explain that it does not participate in any health insurance plans, that it does not represent that patients' claims will be reimbursed, and that it orders tests that are often not covered by health plans
- Revise its consent forms to explain the charges patients may incur for obtaining and reviewing their tests results and to indicate the process for obtaining medical records
- Provide patients with itemized invoices before payments showing what testing and services the patient agreed to purchase, the cost of those services, and any discounts provided
- Send patients monthly statements for as long as there is a balance on their account, including a

balance owed to the patient due to prepayment or overpayment
Develop a systematic process for providing patients with timely refund
Develop a financial hardship policy to formalize the process of providing discounts based on patients' financial inability to pay for the testing and services purchased
Prohibit staff from using personal e-mail accounts to communicate patients' medical information.

Other Problems

In 2015, the Better Business Bureau gave PATH Medical an "F" rating to because it had failed to respond to four complaints made in 2012 or 2013 about its financial practices [27]. Three of the complaints stated that PATH Medical had failed to refund payments made in advance for services that had been canceled or otherwise not received [28]. The [RateMD site](#) has reviews from many people who were highly dissatisfied with their experience at his office.

In 2013, Olga Gilmartin, a former patient, sued Braverman and PATH Medical on grounds that included fraudulent inducement and/or concealment; breach of contract; and unjust enrichment. The complaint alleges that she was misled and improperly pressured into spending approximately \$40,000 for tests and treatments that were inappropriate and produced no benefit, and that a hormone medication for which she paid \$10,000 was not received [29].

In 2014, New York comedian Ari Teman filed suit against Braverman, several associates, and PATH Medical. The complaint included allegations that the defendants (a) diagnosed and treated him for nonexistent aluminum toxicity, (b) improperly diagnosed mental conditions for which he prescribed tranquilizers with severe side effects, and (c) deliberately withheld the results of a test that showed that Teman suffered from sleep apnea [30]. In April 2023, the court dismissed the suit after concluding that ruled that Teman and his attorneys had failed to actively pursue it.

Press reports indicate that in 2011, Braverman and his third wife, Darya, began an extremely contentious battle over their divorce and custody of their three children. In 2014, a New York County Supreme Court judge awarded full custody of their children to Darya. In 2016, the court's Appellate Division upheld the lower court decision with a ruling that concluded:

Sufficient evidence supports the court's determination that defendant, a physician, committed medical child abuse by exaggerating the

children's symptoms and repeatedly subjecting them to unnecessary and at times invasive medical treatment. . . . The court-appointed psychiatrist, specialists in medical child abuse, and the children's pediatrician testified that defendant relentlessly pursued diagnostic medical treatments, took the children to unnecessary specialists, and took them for appointments against the advice of and without telling the pediatrician. The court's determination is further supported by reports from Comprehensive Family Services of his supervised visits with the children, which describe his fixation with their health, his desire to photograph their numerous purported injuries during his visits, and his desire to seek medical treatment during the visits [31].

In January 2015, the *New York Post* reported that (a) Braverman and his attorney Diana Moyhi were arrested for allegedly trying to steal confidential custody-case documents from a courtroom, (b) they were charged with tampering with public records and criminal contempt for disobeying a judge's orders not to remove paperwork that was related to the custody battle, and (c) the wife is claiming that their boys are not safe with him because he has tried to improperly medicate them [32]. In December 2015, he was tried before a judge who found him guilty of attempted petty larceny (a misdemeanor) and sentenced him to 15 days in jail plus a \$175 fine. In 2017, based on this case, the New York State Board for Professional Medical Conduct censured and reprimanded him. The board's order stated that committee that held his hearing "concluded that his character was 'far from perfect' despite the attempts of the testimony and statements to portray otherwise. In fact, at least one character witness' testimony mentioned some 'poor' or 'impaired' judgment." [33].

In 2016, the *New York Post* reported that Braverman had been arrested again and charged with one count of felony sex abuse. The report stated that a criminal complaint had been issued after a woman had accused him of molesting her in his apartment in 2015 [34]. A follow-up report stated that he pleaded guilty to harassment and was barred from having further contact with the woman [35]. In 2017, the *New York Post* reported that Braverman was arrested again and charged with sexually assaulting a female patient at his office [36].

In 2017, Braverman filed for Chapter 11 bankruptcy, listing assets of \$10.7 million and \$19.9 million in liabilities that include more than \$950,000 to the Internal Revenue Service and \$630,000 to his office landlord. The main asset is a New York City apartment owned jointly by him and Darya that he estimated was worth \$7 to \$8 million. His bankruptcy petition indicated that he was

defending against eight lawsuits in addition to the one by Ari Teman [37]. Several of them were by law firms seeking payment for past services. The petition contained a declaration in which Braverman said that his divorce proceeding with Darya had completely drained him financially, professionally, and emotionally; garnered negative publicity; and badly hurt his medical practice and standing in the medical community. Other court documents indicate that his office lease was about to expire and the landlord filed suit to evict him [38,39]. Braverman's bankruptcy filing stayed the pending lawsuits. In July 2019, attorney Moyhi notified the court that the bankruptcy proceedings had been converted to Chapter 7 and then discharged; PATH Medical was no longer operating; and she would no longer represent Braverman because he had stopped paying her [40].

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